UNITED FISHERMEN OF ALASKA

211 Fourth Street, Suite 110
Juneau, Alaska 99801-1172
(907) 586-2820
(907) 463-2545 Fax
E-Mail: ufa@ufa-fish.org
www.ufa-fish.org

April 6, 2006

United Fishermen of Alaska Comments on S. 1195
The National Offshore Aquaculture Act

Presented to the Ocean Policy Study Subcommittee of the
Senate Committee on Commerce, Science, and Transportation
Honorable John Sununu, Chair

Dear Chairman Sununu,

United Fishermen of Alaska (UFA) represents 31 Alaska commercial fishing organizations from fisheries throughout Alaska, the Bering Sea, and Gulf of Alaska, with fishermen from 46 states, accounting for almost half the domestic seafood production of the United States. I am Mark Vinsel, Executive Director of UFA. I also serve as Chairman of the Alaska Fishing Industry Relief Mission, a volunteer effort to provide assistance to the Gulf of Mexico fishing industry in the wake of last summer's hurricanes.

We thank you for the invitation to share our point of view regarding offshore aquaculture and hope that our concerns will guide you in establishing a framework for offshore aquaculture management that will be a benefit to the nation's food production, while sustaining healthy oceans and recovering depleted or diminished stocks for the benefit of all.

There is much misunderstanding of Alaska's well-known ban on finfish farms. It is generally viewed as opposition to all aquaculture. However, Alaska has viable aquaculture operations that produce a variety of shellfish and enhance our natural salmon runs.

The connotations around the term *aquaculture* have largely come to mean "farm", as it is in S. 1195. There is much more to the term than that. Alaska's non-profit regional aquaculture associations release immature salmon as fry or smolt, from coastal bays where there are few or no resident salmon and no identifiable interference with returning natural wild stocks. From the point of their release on, the immature salmon are a common property resource, ranging freely, subject to natural environmental conditions and available for commercial, sport, subsistence and personal use harvests. The intention of Alaska's aquaculture program is to augment, not replace natural stocks, especially during years of lower than average returns. The success of this program is illustrated by

the abundance and health of Alaska's salmon populations with recent yearly returns at all time high levels.

It is common to hear talk of fishermen as the last of a vanishing hunter gatherer tradition that is on the way to extinction, to be replaced by agrarian food producers. We feel there is an unarguable difference between land and water based agriculture. Man's husbandry and manipulation of terrestrial ecosystems clearly has provided increased food production, but in healthy ocean systems it is questionable if a real gain of production could be obtained through man's best efforts. In healthy oceans there are no fences and all biota feeds and is fed upon, creating an integrated food web. This food web produces fish that are a high quality protein with great flavor and nutrition. Free range wild and enhanced salmon harvests depend on the flux of this fluid web of life. Introducing large scale net pen operations would inevitably draw from the natural pasturage available to wild fish.

Wild salmon depend on this pasturage. Large scale fish farms will interfere with their physical presences as well as interdicting the food web which is the sustaining pasturage of viable wild stocks. Precedence has to be given to healthy wild stocks where they exist. Fishermen that have learned to shepard their fisheries to harvest responsibly and sustainably deserve the opportunity to continue.

Where healthy oceans exist, they are worth saving. Where waters have been impaired, priority should be given to restoration of healthy natural systems that can sustain the progression of life for productive fisheries, as consideration is given to fencing them off for fish farms.

We see a big difference between free ranging fish and sedentary mussels growing on ropes, and so far the economic results affirm the viability of the mussel production as a form of aquaculture that can benefit local fishermen and their communities and coexist with existing fisheries. Large scale finfish operations in net pens bring much greater risk and would provide less economic benefit to coastal communities, especially in coastal Alaska where infrastructure is the impediment to getting our fish to market, not a lack of fish.

Arguments that the United States needs to promote finfish agriculture technology to help our balance of trade are belied by history in fish markets, and current trends in all industries that require labor. Finfish aquaculture technology was developed by U.S. universities then adopted by other countries where lower costs of labor and lesser environmental restrictions allow producers a lower cost of production than possible in the United States, and their imports swamped US domestic producers be they salmon fishermen or catfish farmers. It bears noting that in the USDA Trade Adjustment assistance program, U.S. catfish farms and shrimp farms, along with salmon producers from AK, Washington and Oregon were qualified for benefits to compensate from the market effects of increased imports while Maine blueberries were the only non seafood crop that qualified in the first year. The differences in labor and environmental costs will continue to favor low-cost foreign producers, with little likelihood of erasing the seafood balance of trade.

If the goal is to increase production and consumption of domestic seafood, a sizeable gain could be made with an investment in basic infrastructure in Alaska communities, and attention to rebuilding Gulf of Mexico coastal communities in a planned way to retain the most value in wild seafood harvests.

There is no fish farm technology that can more cheaply produce the "superfood" that is Alaska's pink salmon – for which last year's average dock price of 12-14 cents per pound was a strong uptick – and which is proving to be an important source of non-perishable quality protein in government aid programs as we speak.

We recommend that with whatever direction domestic high seas aquaculture development takes, equal attention be paid to protecting existing seafood production. Market impacts should be studied for individual projects. In many coastal communities, there are no other job opportunities available to displaced workers so operations that have the potential of interfering with existing fisheries need to be carefully assessed before damage is done.

Local scientific input is needed in permitting and location. A fish farm operator might desire to utilize areas of natural upwelling to benefit from the availability of a natural free food source. The ocean environment is fluid and dynamic, and every component of the food chain is a necessary component in this complex web of life. We are concerned that placement of large scale fish farms in areas of open ocean would rob the existing web of life in unpredictable ways.

The North Pacific Fishery Management Council (NPFMC) has a good track record of looking into the science and economics of fisheries, and taking a precautionary approach to opening new fisheries and management concepts. They have made difficult decisions and set harvest levels in favor of maintaining stock viability over short term economic gains, and the NPFMC has been party to setting aside large tracts of ocean to be protected from direct fishing activities. The sensitivity of oceans are considered and the very fact of human activity has been deemed a significant impact to the ocean's sensitivity. The NPFMC has a proven track record of good judgment and is the only forum in place for prudent management of the Gulf of Alaska and Bering Sea. Fishermen will be affected by location and operation of fish farms in areas where they fish or travel. The regional councils should hold management *authority* over fish farm operations, with consideration for the social, environmental and economic effects upon ocean resources and existing users, not merely *consultation* as included in S.1195.

Should offshore aquaculture be allowed in U.S. marine waters, fishing businesses and coastal communities need to be considered, and must be allowed to compete on a level playing field in the marketplace. Salmon, halibut, sablefish, and other species that compete with farm raised product need to enjoy access to the same types of research, marketing and support programs provided by the Department of Commerce and Department of Agriculture for fish farm operations.

The ability of a coastal state to modify marine aquaculture practices to fit unique circumstances or to opt out if the state deems the aquaculture activity to be unjustified must be effectively codified within the legislation. The U.S. Senate can delegate authority of aquaculture permitting to states, and this needs to be clear and incontrovertible.

UFA supports SB 2859, which has been re-introduced by Senator Murkowski as Senate amendment 1727 to S.1195, calling for serious study of the social and economic effects before offshore aquaculture is considered.

The precautionary principle is the concept of proving no identifiable harm before implementing substantial changes, and is a fundamental tenant behind Alaska's fisheries resource management. The cost of altering a project or not moving forward with a proposed change, to prevent damage, is far less than trying to restore damage that is already done.

The U.S. Commission on Ocean Policy, and Pew Oceans Commission, both pointed to the need for ecosystem-based management, and called for increased funding for ocean science to better understand these highly dynamic systems. Meanwhile, climate and regime changes are occurring that compound the difficulties in obtaining this baseline science. To introduce large-scale aquaculture to these ocean systems without thorough scientific understanding in place to gauge the effects as they occur is irresponsible. It is very troubling that S.1195 contains so much consideration for existing offshore oil platforms and so little language on the environment into which the farms are to be introduced.

Progress has been made in some areas of large scale fish farming that were troublesome. Antibiotics are not as widely used in technologically advanced aquaculture operations, having been replaced by vaccines that are cheaper and more effective. And it may seem that the concentration of wastes may be less of a problem in the open ocean than they are in nearshore environments. But the oceans are not limitless and in large scale operations the effects may not be as noticeable but are there nonetheless. The Pew Oceans report noted that the cumulative effects of many sources of non-point source pollution are a huge problem to ocean health, and introduction of large scale fish farms would further this problem. A further problem with cumulative non-point source pollution is that it precludes any meaningful concept of responsibility. Waiting until the fish are gone, then trying to figure out who to blame does not protect the fish. At a minimum, fish farms need to have proven standards which substantially reduce risks before permitting.

Near shore fish farms continue to suffer from increased parasites such as sea lice with harm to naturally occurring fish stocks that pass through the area. With a tremendous increase in investment in science required for ecosystem based management, we may someday be able to pick a site for a fish farm where we can safely assure that no natural fish will be affected, but we are a long way from that level of knowledge now. We feel that the potential environmental impacts justify a thorough Legislative Environmental Impact Statement.

There should be no exemption from existing labor laws and applicable regulations concerning transportation such as the Jones Act, and no bypassing of regulatory framework in place for our coasts and oceans.

The term "Exclusive Economic Zone" clearly should preclude foreign ownership.

Species that do not occur naturally in an area should not be considered, as they will escape with unpredictable consequences. Farmed fish can and must be marked by economical but scientifically valid methods such as thermal otolith marking to ensure that any escaped fish that cause harm can be attributed to their producer.

In the future, there may be a place for aquaculture in maintaining healthy oceans, but current technology does not adequately protect existing ocean resources from harm from fish farms seeking to grow fish to market size in coastal or ocean waters. It may be worthwhile to look to the model of Alaska's salmon aquaculture programs to raise and release fingerlings with the emphasis on enhancing rather than replacing natural stocks, for a common property resource available to all, and to help restore diminished fish stocks with long life cycles and extended predicted rebuilding times, for the benefit of all Americans. These operations must be consistent with ecosystem based management based on sound science and a precautionary approach. Please be very cautious in your drafting of regulations for the permitting of offshore aquaculture, and heed the old saying – *first, do no harm.*

Mark Vinsel
Executive Director
United Fishermen of Alaska